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11 Trust; Byron Georgiou individually and as
12 trustee of the Georgiou Family Trust; and
Benjamin Hill Realty, LLC

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

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16 Georgiou Family Trust, a Nevada trust;
17 Byron Georgiou, as an individual and as
18 trustee of the Georgiou Family Trust;
19 Benjamin Hill Realty, LLC, a Nevada
20 limited liability company.

21 Plaintiffs,

22 v.

23 Phillip V. Ruthen, an individual; Shaw
24 Industries Inc., a corporation; L. Lake
25 Jordan, an individual; Suncrest Stone
26 Products, LLC, a business entity; Jeffrey W.
27 Stevens, an individual; and Does 1-100,
28

Defendants.

CASE NO.: 2:21-cv-01060-JCM-DJA

**STIPULATION AND
[PROPOSED] ORDER TO
EXTEND TIME TO FILE
PLAINTIFFS' REPLY RE:
MOTION FOR LEAVE TO
AMEND FROM CURRENT
DEADLINE OF DECEMBER
13, 2021 TO DECEMBER 30,
2021**

(FIRST REQUEST)

**TO THE CLERK OF THE ABOVE-TITLED COURT AND TO ALL
PARTIES AND THEIR ATTORNEYS OF RECORD:**

IT IS HEREBY STIPULATED by and between the parties through their respective counsels that Plaintiffs Georgiou Family Trust; Byron Georgiou; and Benjamin Hill Realty, LLC ("Plaintiffs") shall have through and including December 30, 2021, within which to file and serve their replies ("Replies") re: their motion for leave to amend (ECF NO. 69) ("Motion").

The current deadline for Plaintiffs to file their Replies is currently set for December 13, 2021. This is the first such request.

Pursuant to Local Rule IA 6-1(a), the Parties state the reason for the extension of time is that the attorneys for Plaintiffs still need more time to fully review the responses by Defendants to the Motion, draft, and finalize their three Replies to the three responses by Defendants. Further, counsel for Plaintiffs are traveling and/or are out of town due to pre-set holiday plans and vacation.

The Parties have therefore agreed to providing Plaintiffs an extension of time to file their replies to the three responses filed with respect to the Motion. The Parties have entered into an agreement in good faith and not for purposes of delay. It is respectfully requested that the Court approve this stipulation and provide Plaintiffs until December 30, 2021 to respond to the responses. No further extensions will be requested by Plaintiffs.

The Parties agree and stipulate as such.

MURCHISON & CUMMING, LLP

DATED: December 10, 2021

/s/ Pamela C. Chalk

Pamela C. Chalk, Esq.

Anton N. Handal, Esq.

Attorneys for Plaintiffs

LEWIS ROCA ROTHGERBER CHRISTIE LLP

DATED: December 10, 2021

/s/ Chelsee C. Jensen

J.Christopher Jorgensen, Esq.

Chelsee C. Jensen, Esq.

Attorneys for Defendant

Shaw Industries Inc.

BAILEY ❖ KENNEDY

DATED: December 10, 2021

/s/ Andrea M. Champion

Dennis L. Kennedy, Esq.

Andrea M. Champion, Esq.

Attorneys for Defendant Phillip V. Ruthen

LIPSON NEILSON P.C

DATED: December 10, 2021

/s/ Megan H. Thongkham

Joseph P. Garin, Esq.

Megan H. Thongkham, Esq.

Attorneys for Defendant L. Lake Jordan

ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 12/14/2021

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on this date to all counsel of record, if any to date, who are deemed to have consented to electronic service via the Court's CM/ECF system. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery upon their appearance in this matter.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed this 10th day of December, 2021.

DATED: December 10, 2021

MURCHISON & CUMMING, LLP

/s/ Pamela C. Chalk

Pamela C. Chalk